

REMARKS/ARGUMENTS

The Examiner is thanked for the clarity and conciseness of the Office Action and for the citation of the references which have been studied with interest and care.

Claim Rejections - 35 U.S.C. § 102

Claims 1-2, 4-18 [sic] were rejected under 35 U.S.C. 102(b) as being anticipated by Kellogg et al. (US 5,833,381).

Kellogg et al. discloses a combination printer and scanner that includes a removable document feeder "for facilitating the clearing of paper jams, the cleaning of its scanner window and the removal of debris." [Kellogg et al., column 2, lines 1-5.] Referring to FIG. 1 of Kellogg et al.:

An operator may lift the pen door 56 to its open position illustrated in FIG. 1, remove the document feeder cartridge 62 and fix a paper jam, clean the scanner window 28 or remove any debris, such as dust, white-out residue, or a staple. It is important to be able to clean the scanner window 28, since debris thereon may cause vertical streaks to appear in the facsimile reproduction of the document sent by the modem 34 when printed at the remote receiving station.

[Kellogg et al., column 4, lines 31-39.]

At page 2 of the Office Action, it was asserted that "Kellogg teaches the media chassis, which includes the lower document feeder, extends such that dust or debris can fall through the aperture." Applicant respectfully traverses any assertion that Kellogg anticipates any of the claims in the subject application.

As a preliminary matter, it is clear from the discussion in Kellogg et al. (quoted above) that the scanner window 28 is a piece of transparent material (such as glass) that may need to be cleaned from time to time. A principle object of Kellogg et al. (also quoted above) is to provide a removable document feeder cartridge 62 for facilitating cleaning of the scanner window 28. Any assertion that the scanner window 28 is an aperture through which dust or debris can fall is clearly erroneous, and any such assertion is strenuously traversed.

Thus, with regard to claims 1, 6, 14 and 18, Kellogg et al. does not disclose or suggest a media conformance member/lower document feeder portion including an aperture through which the optical path extends without obstruction such that dust or debris can fall through the aperture.

To the extent that Kellogg et al. discloses a "reference surface", such a surface appears to be provided by an underside portion of the removable document feeder cartridge 62 when in its closed position. To the extent that Kellogg et al. discloses a "media conformance member", such a member appears to be provided by the scanner window 28 -- shown as a flat object in FIG. 1 of Kellogg et al.

Thus, further with regard to claim 1, it is respectfully submitted that Kellogg et al. provides no disclosure or suggestion of "the media conformance member being formed such that media advanced by the document feeder along the media path is biased toward the reference surface." Similarly, with regard to claim 11, Kellogg et al. provides no disclosure or suggestion of "a media conformance member which biases media advanced along the media path toward the reference surface." Similarly, with regard to claim 14, Kellogg et al. provides no disclosure or suggestion of "a media conformance member shaped to push a piece of media against the upper document feeder portion." Similarly, with regard to claim 18, Kellogg et al. provides no disclosure or suggestion of "the media path being configured to push a piece of media in the media path against the reference surface."

As noted above, in Kellogg et al. the scanner window 28 is shown as a flat object in FIG. 1. Thus, further with regard to claim 5, Kellogg et al. provides no disclosure or suggestion that "the media conformance member includes a ramp portion adjacent the aperture." Similarly, with regard to claim 12, Kellogg et al. provides no disclosure or suggestion that "the media conformance member includes at least one ramp portion." Similarly, with regard to claim 17, Kellogg et al. provides no disclosure or suggestion that "the media conformance member includes a top portion facing the reference surface and a ramp portion adjacent the top portion."

An additional claimed feature relates to the raised portion 220 (FIG. 2) which functions to curl a piece of media upward to prevent the back edge of the piece of media from falling into the aperture 152. Further with regard to claim 8, Kellogg et al. provides no disclosure or suggestion that "the upper document feeder portion includes a raised portion adjacent the reference surface." Further with regard to claim 9, Kellogg et al. provides no disclosure or suggestion that the "raised portion is positioned after the reference surface along the media path." Similarly, with regard to claim 20, Kellogg et al. provides no disclosure or suggestion that "the upper portion includes a raised surface which is positioned after the reference surface along the media path."

For the reasons discussed above, withdrawal of this rejection is respectfully requested.

Allowable Subject Matter

Claim 3 was objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

In view of the foregoing remarks, it is respectfully submitted that claim 3 is allowable in its present form.

CONCLUDING REMARKS

Applicants submit that the application is in condition for allowance. Concurrence by the Examiner and early passage of the application to issue are respectfully requested.

Respectfully submitted,



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